**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PASAFESHARE LLC,
 	
     Plaintiff,
 	
  V.
 	
MICROSOFT CORPORATION,
 	
     Defendant.
	Case No. 6:20-cv-00397-ADA

JOINT CLAIM CONSTRUCTION STATEMENT

In accordance with the Amended Scheduling Order (D.I. 32) entered in the above-captioned action, Plaintiff paSafeShare LLC ("paSafeShare") and Defendant Microsoft Corporation ("Microsoft") submit this Joint Claim Construction Statement. This Statement identifies the agreed and disputed constructions for claim terms found in U.S. Patent Nos. 9,455,961 ("'961 patent"); 9,615,116 ("'116 patent"); and 10,095,848 ("'848 patent").

I. AGREED CLAIM CONSTRUCTIONS

Claim Term	Parties' Agreed Construction	Patent(s); Claims
"Limited Capability Viewer (LCV)" Proposed by Microsoft	"a program for consuming content, where the program has one or more capabilities that can be restricted"	'961 patent; claims 1, 11, 14 '116 patent; claims 1, 25, 29 '848 patent; claims 1, 17, 18

II.   DISPUTED CLAIM CONSTRUCTIONS

Claim Terms	paSafeShare's Construction	Microsoft's Construction	Patent(s); Claims
"software instructions . . . executed by a processor" Proposed by Microsoft	Plain and ordinary meaning	Plain and ordinary meaning (i.e., executable software instructions)	'961 patent, claims 1, 11, 14 '116 patent, claims 1, 25, 29 '848 patent, claims 1, 17, 18
"enabling an authorized user communicating via a secure tunnel or virtual private network to modify PDP content via an editing mode associated with said LCV" Proposed by Microsoft	Plain and ordinary meaning	"if an authorized user is communicating via a secure tunnel or virtual private network, then enabling that authorized user to modify PDP content via an editing mode of the LCV"	'961 patent, claims 6, 14 '848 patent, claims 15, 18
"Publisher Key" Proposed by Microsoft	"information for decrypting content from a content publisher and containing usage restriction(s) on the content"	*Indefinite*	'961 patent, claims 1, 11, 14 '116 patent, claims 1, 25, 29 '848 patent, claims 1, 17, 18
"enhanced user authentication or authorization (EUAA) information" Proposed by Microsoft	"information about a user that identifies the user for authentication or authorization"	*Indefinite*	'961 patent, claims 2-4, 12, 13

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Respectfully submitted,

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